

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

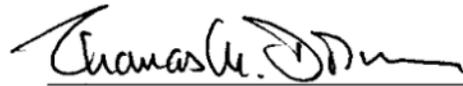
MODIFICATION TO WESTERN KENTUCKY)	
GAS COMPANY, A DIVISION OF ATMOS)	
ENERGY CORPORATION, GAS COST)	
ADJUSTMENT TO INCORPORATE AN)	CASE NO. 2001-317
EXPERIMENTAL PERFORMANCE-BASED)	
RATEMAKING MECHANISM (PBR))	

SECOND DATA REQUEST OF COMMISSION STAFF
TO WESTERN KENTUCKY GAS COMPANY

Western Kentucky Gas Company ("Western"), pursuant to 807 KAR 5:001, is requested to file with the Commission the original and 8 copies of the following information, with a copy to all parties of record. The information requested herein is due on or before December 7, 2001. Each copy of the data requested should be placed in a bound volume with each item tabbed. When a number of sheets are required for an item, each sheet should be appropriately indexed, for example, Item 1(a), Sheet 2 of 6. Include with each response the name of the person who will be responsible for responding to questions relating to the information provided. Careful attention should be given to copied material to ensure that it is legible. Where information herein has been previously provided, in the format requested herein, reference may be made to the specific location of said information in responding to this information request.

1. Refer to Item 5(e) in Western's response to the Commission Staff's data request dated November 9, 2001 which describes the Atmos companies' gas supply PBR mechanisms in Georgia and Tennessee.

- a. Provide the rationale for using a tolerance zone in Georgia and Tennessee.
 - b. Explain the basis for the sharing percentages in Georgia and Tennessee.
 - c. Provide a copy of the orders establishing the PBR mechanisms in Georgia and Tennessee.
 - d. Explain why the NYMEX is not used as a benchmark in the Georgia PBR.
 - e. Explain the basis for the \$1.25 million annual cap in the Tennessee PBR.
 - f. Explain why Western did not propose a tolerance zone in its PBR.
2. Refer to Item 11 in Western's response to the Commission Staff's data request dated November 9, 2001. Would it be correct to state that under the current arrangement with Woodward LLC ("Woodward"), Western makes the decisions and Woodward executes those decisions? If not, explain the current arrangement.
 3. Refer to Item 16 in Western's response to the Commission Staff's data request dated November 9, 2001. Since Western could not make an estimate of the revenues and costs associated with the OSS mechanism for the previous 3 years, provide the information upon which Western relied for its belief that net benefits would have been less than the incremental discount bid by the supplier.
 4. Refer to Item 18(b) in Western's response to the Commission Staff's data request dated November 9, 2001. Explain whether the response should read "Western does not plan on increasing storage capacity at this time."



Thomas M. Dorman
Executive Director
Public Service Commission
211 Sower Boulevard
P. O. Box 615
Frankfort, Kentucky 40602

DATED November 26, 2001

cc: All Parties